



Connecticut Chapter  
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*March 8, 2012, Joint Committee on Energy and Technology*

*Written Testimony submitted by*

*Jeffrey Arn, Vice President of Housing and Legislation*

*On behalf of the membership of Conn-NAHRO*

*Conn-NAHRO is the Connecticut chapter of the National Association of Housing and Redevelopment Officials; its membership is comprised of Public Housing Authorities and other individuals and organizations involved in affordable housing.*

Co-Chairs Fonfara and Nardello and members of the Energy and Technology Committee:

My name is Jeffrey Arn, I am the current, Vice President of Housing and Legislation for Conn-NAHRO, I am the Executive Director of the Vernon Housing Authority and I also serve as a Commissioner for the Coventry Housing Authority. **I am writing in opposition of Raised Bill No. 5385, "An Act Concerning Energy Retrofits For Certain Buildings and the Disclosure of the Energy Efficiency of Certain Buildings".**

If passed, this bill will create yet another unfunded mandate for housing authorities and private landlords throughout the State. Section 2 of this proposed bill would require housing authorities and private landlords to provide utility consumption information from to prospective tenants. Unfortunately, utility companies are not willing to provide this information to a property owner if they do not pay for the utility being provided. Even with a signed release from the occupant that is paying the bill some utility companies will not provide this information. Therefore, this bill will require housing authorities and landlords to provide information they cannot produce. We do understand that the bill attempts to provide an alternative to this by allowing for a good faith estimate by the landlord. This places the landlord in a precarious position if the "good faith" effort is inaccurate which could causes financial damages up to and including eviction for non-payment of rent.

In addition to the aforementioned issues we believe that "Expenses" are an inaccurate way to measure out-of-pocket heating costs.

- 1.) Data shows that the largest factor effecting energy consumption is the behavior of the occupant,
- 2.) A former tenant may have been proactive and opted for a competitive supplier of electricity, thereby lowering the cost by 10%+,
- 3.) Some leases require tenants to purchase fuel oil on the open market. This opens up a number of different possibilities – cost of oil from different suppliers, cash only deliveries, etc. – resulting in the "expenses" being too unreliable for a new tenant to rely on in budgeting their money.

In short, the data that would be provided by this bill will involve too many variables to make useful. This bill would also create an increase legal exposure in terms of time and liabilities to Housing Authorities and Landlords.

Thank you for taking the time to read this testimony.